

Marlene Dortsch
FCC Secretary

February 24, 2008

Re.: 07-51

Ms. Dortsch,

On Thursday, February 21, 2008, representatives of the Independent MultiFamily Communications Council, IMCC, met with officials of the Federal Communications Commission. The IMCC representatives were Dan Terheggen, Consolidated Smart Systems; Kevin Coyle, Ygnition; Pat Hagen, Blue Top Communications; Bryan Rader of Rader Consulting; Bob Palle, Blonder Tongue and the undersigned.

We met with Commissioner Adelstein and Rudy Brioche', Commissioner Copps and Rick Chesson, Commissioner Tate and Amy Blankenship, Michelle Carey and staff of the Media Bureau, including Rosemary Harold, John Norton, John Berresford, Holly Sauerer and Nancy Murphy.

We discussed the IMCC Comments on the FNPRM, 07-51, filed on February 6, 2008. Specific issues, including the following, were

discussed. All issues discussed were included in the IMCC Comments.

1. Do Private Cable Operators (PCOs) provide meaningful competition in Multiple Dwelling Unit (MDU) communities?
2. Does that competition benefit MDU residents?
3. How are PCOs financed and what is the PCO business model?
4. Could that business model continue if PCOs are not allowed to enforce exclusive access/service agreements?
5. Are PCOs small without market power and are there FCC precedents defining those terms?
6. Are there FCC regulatory precedents that demonstrate that some service providers are accorded different treatment from other service providers?
7. How do bulk contracts and marketing agreements influence the MDU market?

Respectfully submitted,

William J. Burhop
IMCC Executive Director
3004 Oregon Knolls Drive NW
Washington, DC 20015

